



Sierra Club Yahi Group

SEP 13 1999

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September 10, 1999

Mr. Lester Snow
CalFed Bay-Delta Program
1416 Ninth Street, #1155
Sacramento, CA 95814

Re: Comments on Draft Programmatic EIS/EIR

Dear Mr. Snow:

The Yahi Group of the Sierra Club has reviewed the Draft EIS/EIR, in addition to the separate document relating to water transfers, and the Executive Committee of the Group has approved the attached general policy entitled "Water and Water Transfers".

The CalFed process is of particular importance to the members of our Sierra Club Group. As residents of Northern California counties, we are distinctly aware as Sierra Club members, that much of the water anticipated to be transferred to other parts of the State is planned, through the CalFed process, to come from the geographical area in which our members live and work.

Many people are very interested in the potential effects of new dams in our area. However, the land below the Sacramento Valley is essentially being assumed to be an "underground dam" from which water can be pumped and from which water can be subsequently transported to other areas of the State.

A review of the Draft EIS/EIR raises concerns that potential adverse impacts, both natural environmental as well as agriculture, have not been adequately addressed in the work completed to date.

Therefore, please review and respond in the Final EIS/EIR to the four circled position statements in the attached policy statement from the Sierra Club Yahi Group. Please note also that as residents who will be directly affected due to water transfers facilitated by the CalFed process, that our position may not be the same as other Sierra Club group members elsewhere in California.

Sincerely,

Betty Volker, Chair
Urban Growth Committee

cc: Linda Stukey, Sierra Club Yahi Group
Warren Alford, Coordinator, Mother Lode Chapter

Attachment: Water and Water Transfers

**Water and Water Transfers
Sierra Club - Yahi Group Position**

We believe in sustainable communities. Transferring water from one basin to another and over long distances as is currently effected in California is contrary to the concept of sustainability. Political realities have allowed Southern California to grow beyond its ability to sustain itself. We do not believe this is a viable method of organizing our populations and the resources that they use, but realize that in the short term the practice will likely continue.

Our position statement concentrates on issues related to our locale, which is considered by non-residents to be a source area for water.

- ① If water is to be transferred outside its natural water basin, every transfer should meet the following criteria:
 - A.. No harm to the source aquifer or surface waters, neither as to water levels or stream flows required by the native flora and fauna. There should be no degradation in the water quality.
 - B. Users to pay all fees associated with the transfer including mitigation if necessary.
 - C. No transfer to be permanent, but rather to be contracted year to year.
- ② If, due to circumstances beyond the State's ability to manage, it is necessary to make any transfer that damages the water in the basin, then the payment for the degrading transfer should be to the benefit of all residents of the basin.
- ③ Key criteria for water qualities should be established by engineering study and subject to public input. Under no circumstances should a small local board or commission, which would likely become dominated by water sellers, be allowed discretion over any decision which could adversely affect water quality or quantity.
- ④ If it is necessary to increase the storage capacity of the region, then the only acceptable method is to restore upper watershed and forest health which will provide increased natural storage capacities that have been damaged by indiscriminate logging and foraging practices.

Note: This position is the result of a vote by the elected executive committee vote of the Yahi Group. It does not necessarily represent the position of either the Sierra Club as an international organization nor the Motherlode (Sacramento) Chapter to which the Yahi Group is attached.